

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF SOUTH CAROLINA  
3 CHARLESTON DIVISION  
4 IN ADMIRALTY

5 TIFFANY N. PROVENCE, AS THE  
6 PERSONAL REPRESENTATIVE OF  
7 THE ESTATE OF JUAN ANTONIO  
8 VILLALOBOS HERNANDEZ,

Plaintiff,

vs. CASE NO. 2:21-cv-965-RMG

9 UNITED STATES OF AMERICA,  
10 CROWLEY MARITIME CORPORATION,  
11 CROWLEY GOVERNMENT SERVICES,  
12 INC., DETYENS SHIPYARDS, INC.  
13 AND HIGHTRAK STAFFING, INC.,  
14 D/B/A HIGHTRAK STAFFING, INC.,  
15 Defendants.

VTC

30(b)(6)

(CONTINUED)

15 DEPOSITION OF: CROWLEY GOVERNMENT  
SERVICES BY PAUL VARGHESE

16 DATE: March 9, 2022

17 TIME: 10:44 AM

18 LOCATION: Hines & Gilseman, LLC  
19 1535 Hobby Street, Suite 203D  
20 Charleston Navy Yard  
21 North Charleston, SC

TAKEN BY: Counsel for the Plaintiff

22 REPORTED BY: Priscilla Nay,  
23 Court Reporter  
24 (Remotely via VTC)  
25

1 about the systems like you just explained it,  
2 right?

3 MR. GILSENAN: Objection.

4 THE WITNESS: He did not know anything  
5 about the rigging.

6 BY MR. YOUNG:

7 Q. Okay.

8 A. He knew it was a system operation.

9 Q. Okay. Yes. Good. And it's also true  
10 that between November of 2018 and August 3rd of  
11 2019 nobody from Crowley observed any hazardous  
12 condition related to the lifeboats or the lifeboat  
13 davits on the Lummus. Is that accurate?

14 A. Crowley has not -- Crowley reps have  
15 not identified a visible in the sense there were  
16 six lifeboats rigged almost the same way. So there  
17 was nothing triggering them to see that one isn't  
18 the -- one is a hazard and the others are not.

19 So basically what the -- the rigging  
20 experts of the Detyens did was thought to be the  
21 correct way to do it.

22 Q. But you know today that that was not  
23 the correct way, right?

24 A. I do not -- I cannot answer that one  
25 because I have not seen that one or I have not

1 inspected and then until we -- we know exactly what  
2 was the root cause of that failure -- because there  
3 were six davits were restrained the same way.

4 One failed. Five did not. That means  
5 there could be other reasons, you know, like  
6 electrical current going through some -- some  
7 source or, you know, they didn't use the same --  
8 same wire. You know, same method to that.

9 We don't know. That is why there was  
10 nothing visible because all six were, you know,  
11 rigged there and then, you know, that is why it  
12 didn't trigger him to take number -- Number 5  
13 for -- for a particular action.

14 Q. Okay. So you believe that all six of  
15 these lifeboat davits systems were -- excuse me --  
16 were rigged properly and safely. Is that your  
17 testimony?

18 A. It's for Detyens to answer that because  
19 we contracted that through Detyens and then we --  
20 under their safety management system we assumed  
21 that they did that correctly or if not, you know,  
22 they -- they need to answer to that.

23 Q. All right. You've seen the OSHA  
24 violations. Those don't affect your testimony in  
25 any way. Is that right?